

Michael J. Riccobono, Esq. (MR5783)
GIBBONS P.C.
One Gateway Center
Newark, NJ 07102-5310
Telephone: (973) 596-4500
Facsimile: (973) 596-0545
mriccobono@gibbonslaw.com
Attorneys for Plaintiff
Newell Rubbermaid Sales & Marketing Group, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NEWELL RUBBERMAID SALES &
MARKETING GROUP, INC.,

Plaintiff,

vs.

LEE TSUKROFF,

Defendant.

Civil Action No. 2:15-cv-06258-KSH-CLW

Document filed electronically

**STIPULATION VACATING CLERK'S
ENTRY OF DEFAULT, WITHDRAWING
MOTION FOR DEFAULT JUDGMENT,
AND CONSENTING TO THE FILING OF
DEFENDANT'S ANSWER**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Newell Rubbermaid Sales & Marketing Group, Inc. ("Newell Rubbermaid"), and Defendant Lee Tsukroff ("Tsukroff"), through their undersigned counsel, as follows:

1. The Clerk's Entry of Default dated October 2, 2015 against Tsukroff for failure to plead or otherwise defend is hereby vacated;
2. Newell Rubbermaid's Motion for Default Judgment (Document No. 8), currently returnable on November 2, 2015, is hereby withdrawn; and
3. Newell Rubbermaid consents to the filing of Tsukroff's Answer (Document No. 10).

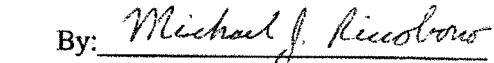
IT IS FURTHER STIPULATED AND AGREED that: (1) this Stipulation may be executed in counterparts, and (2) facsimile signatures shall have the same force and effect as originals.

BIO & LARACCA, P.C.
331 Central Avenue
Orange, New Jersey 07050
Telephone: (973) 675-6006
Facsimile: (973) 675-7333
Attorneys for Defendant
Lee Tsukroff

By: 
Marco A. LaRacca

Dated: October 22, 2015

GIBBONS P.C.
One Gateway Center
Newark, NJ 07102-5310
Telephone: (973) 596-4500
Facsimile: (973) 596-0545
mriccobono@gibbonslaw.com
Attorneys for Plaintiff
Newell Rubbermaid Sales & Marketing Group,
Inc.

By: 
Michael J. Riccubono

Dated: October 22, 2015

SO ORDERED.


Hon. Cathy L. Waldor, U.S.M.J.
10/22/15